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**FILED**  
DISTRICT COURT OF GUAM

**FEB 20 2026**

**JEANNE G. QUINATA**  
CLERK OF COURT

6 Attorneys for the United States of America

7 IN THE UNITED STATES DISTRICT COURT

8 FOR THE DISTRICT OF GUAM

9 UNITED STATES OF AMERICA,

10 Plaintiff,

12 vs.

13 BINGKUN FENG,

14 Defendant.

MAGISTRATE CASE NO. 26 - 00018

**COMPLAINT**

**ENTERING MILITARY PROPERTY**

[18 U.S.C. § 1382]

(Count 1)

**PHOTOGRAPHING A DEFENSE**

**INSTALLATION**

[18 U.S.C. § 795]

(Count 2)

17 THE UNDERSIGNED COMPLAINANT CHARGES UPON INFORMATION AND BELIEF  
18 THAT:

19 **COUNT 1 – ENTERING MILITARY PROPERTY**

20 On or about February 19, 2026, in the District of Guam and within the jurisdiction of the  
21 United States, the defendant, BINGKUN FENG, did knowingly and intentionally go upon a United  
22 States military reservation, station and installation, to wit, Andersen Air Force Base, Guam,  
23 (“AAFB”) for a purpose prohibited by law and lawful regulation, that is, the access to the AAFB  
24 and intending to engage in Photographing a Defense Installation in violation of Title 18, United

1 States Code, Section 795, all in violation of Title 18, United States Code, Section 1382.

2 **COUNT 2 – PHOTOGRAPHING DEFENSE INSTALLATION**

3 On or about February 19, 2026, in the District of Guam, at Andersen Air Force Base, Guam  
4 (“AAFB”), a military and Air Force reservation, station and installation, designated as a vital  
5 military installation requiring protection against the general dissemination of information relative  
6 thereto, the defendant, BINGKUN FENG, did knowingly and intentionally make photographs of  
7 such vital military installation without first obtaining permission of the commanding officer of the  
8 military station, any separate military command concerned, and higher authority, and promptly  
9 submitting the product obtained to such commanding officer and higher authority for censorship  
10 and such other action as he may deem necessary, all in violation of Title 8, United States Code,  
11 Section 795.

12 COMPLAINANT FURTHER STATES:

13 1. I, Courtney Lynn Robertson, being duly sworn, do hereby depose and say the  
14 following: On 19 February 26 at approximately 1120 hours Chamorro Standard Time (ChST),  
15 BINGKUN FENG drove to the AAFB Main Gate Entry Control Point (ECP), in the vicinity of  
16 (IVO) Military Grid Reference System (MGRS) coordinates 55PBR7279900585. Staff Sergeant  
17 (SSgt) Aiden Advincula, 36th Security Forces Squadron (SFS), AAFB, GU observed that  
18 BINGKUN FENG held up his phone as he drove forward, in a manner consistent with capturing  
19 photos or video. SSgt Advincula approached BINGKUN FENG and observed the screen of his  
20 phone was visible and he was using a Chinese navigation software application to navigate. SSgt  
21 Advincula observed there was a pin location on this navigation software application indicating that  
22 BINGKUN FENG intended to drive to a location marked “HSC-25”. The acronym “HSC-25” is  
23 commonly used to represent the Helicopter Sea Combat Squadron 25, which is a Navy helicopter  
24 squadron assigned to AAFB, GU. SSgt Advincula observed this pin location was on AAFB near

1 the flight line.

2 2. Approximately 50 meters prior to the ECP there is a blue line painted on the roadway  
3 with white lettering which states "U.S. Government Property". This line is also referred to the line  
4 of demarcation which delineates the base boundary of U.S. Military installations from public land.

5 3. There are signs posted outside of the Main Gate ECP, AAFB, GU indicating that  
6 AAFB, GU is accessible by authorized personnel only, and there are translations of this message  
7 in multiple languages to include Mandarin. Additionally, there is a sign indicating that  
8 photography of the installation is prohibited. This sign depicts a camera which is circled in red  
9 with a line diagonally through it, indicating visually that photography is prohibited. Finally, there  
10 is sign posted outside of AAFB which states AAFB is a "hands free" installation which means  
11 electronic devices are not to be handled while operating a motor vehicle.

12 4. While at the Main Gate ECP, AAFB, GU, BINGKUN FENG asked Senior Airman  
13 (SrA) Magdalena Gergaud, Installation Entry Controller, 36 SFS, AAFB, GU if he could take a  
14 photo of her to which SrA Gergaud declined. SrA Gergaud then observed BINGKUN FENG hold  
15 up his phone in a manner consistent with capturing photographs or video. SSgt Advincula also  
16 observed BINGKUN FENG hold up his phone in a manner consistent with capturing photos or  
17 video of him.

18 5. SA Courtney Robertson, OSI Det 602, AAFB, GU and SA Adam Cook, OSI Det  
19 602, AAFB, GU responded to the Main Gate ECP of AAFB, GU. BINGKUN FENG consented  
20 for SA Robertson and SA Cook to search his phone's photo gallery, which disclosed there were  
21 two photos of 36 SFS members with the AAFB installation in the background. The first photo  
22 depicted SrA Gergaud standing at the Main Gate of AAFB, GU with the Main Gate ECP building  
23 in the background. The second photo depicted SSgt Advincula standing at the Main Gate of AAFB,  
24 GU with the Main gate ECP and inbound lane of traffic visible in the background. Additionally,

1 there were two photos of the AAFB sign which is located outside of the Main Gate ECP. This sign  
2 depicts the words "United States Air Force Andersen Air Force Base Guam USA". Lastly, there  
3 were two photos of the AAFB Main Gate ECP inbound traffic lane with the Main Gate ECP visible  
4 in the background. BINGKUN FENG also consented to a search of the navigation software  
5 application that was downloaded onto his phone. A review of this navigation software application  
6 disclosed the pin location BINGKUN FENG was attempting to access was marked "HSC-25". The  
7 navigation software indicated the location "HSC-25" was on "Andersen Air Force Base". The  
8 navigation software application was in Chinese and translated, via Google Translate, in English to  
9 "Gaode Map".

10 6. An interview of BINGKUN FENG revealed he arrived in Guam with his minor son,  
11 Mr. Z. F., born in 2015, People's Republic of China passport number EJ6998820, on February 18,  
12 2026, via Korean Airlines Flight LJ917. BINGKUN FENG booked a hotel room for three nights  
13 at The New Harmon Loop Hotel, IVO MGRS: 55PBQ6405694624 and for one night at the Hilton  
14 Guam Resort and Spa, IVO MGRS: 55PBQ6034494089. BINGKUN FENG rented a Grey Kia K4  
15 from Dollar Car Rental with Guam License Plate Number: YN7877. BINGKUN FENG and his  
16 son are scheduled to depart Guam on 22 February 2026 via Korean Airline Flight LJ918.  
17 BINGKUN FENG learned about Guam and AAFB from the Chinese news network and the  
18 Chinese social media app Little Red Book (translated via Google Translate). BINGKUN FENG  
19 explained the Chinese news network often broadcasted about AAFB and the capabilities of the  
20 U.S. F-22 aircraft. BINGKUN FENG claimed he saw photographs of the exterior base sign on  
21 several posts regarding Guam itineraries. BINGKUN FENG used Chinese navigation app Gaode  
22 Map (translated via Google Translate) with the intent to visit the HSC-25 location. Gaode Map  
23 had the location of the HSC-25 680 meters inside the Main Gate entrance on Arc Light Boulevard  
24 IVO MGRS: 55PBR7337700878. BINGKUN FENG relayed Chinese nationals were not allowed

1 to enter Chinese military installations and they would likely be arrested if they attempted entry.  
2 BINGKUN FENG also relayed photography of Chinese military personnel, locations or equipment  
3 was prohibited and could lead to an arrest if caught. BINGKUN FENG claimed he was a criminal  
4 and civil attorney for Hebei Shunxing Law firm, Wen An County, Yingbin Road 5-1-111#,  
5 Langfang, China. BINGKUN FENG obtained a bachelor's degree in engineering from Hebei  
6 University of Technology. BINGKUN FENG explained law school was not required to be an  
7 attorney in China. Chinese nationals only require a certificate to practice law. BINGKUN FENG  
8 was a single parent to his son after his wife divorced him due to low income.

9 7. BINGKUN FENG's cellular device was seized by OSI based upon military search  
10 authority. The device seized was a Blue iPhone 14 bearing serial number MVCJX7761L.

11  
12 FURTHER AFFIANT SAYETH NAUGHT

13 DATED 20th day of February 2026.

14  
15   
16 \_\_\_\_\_  
17 COURTNEY LYNN ROBERTSON  
18 Special Agent  
19 Air Force Office of Special Investigations

20 SUBSCRIBED AND SWORN TO before me on this 20th day of February 2026.

21   
22 \_\_\_\_\_  
23 ARTHUR R. BARCINAS  
24 Designated Judge  
District of Guam